

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA,

Plaintiff,

-against-

**NOTICE OF MOTION
07Cr.815(HB)**

KAMILJAN TURSUNOV,

Defendant.

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PLEASE TAKE NOTICE, that upon the papers and proceedings that constitute the record to date, the undersigned Richard Jasper, Esq., counsel for Kamiljan Tursunov, will move this court, at the United States Courthouse, at 500 Pearl Street, New York, New York, at a time and date to be fixed by the Court for the following relief:

1. An order directing the government to provide advance notice of 404(b) material.
2. An order directing the government to provide all information that is material and favorable to the defendant pursuant to *Kyles v. Whitley*, 115 S.Ct. 1555 (1995), *Brady v. Maryland*, 373 U.S. 73 (1963), *Giglio v. United States*, 405 U.S. 150 (1972), *United States v. Bagley*, 473 U.S. 667 (1987) and their progeny.
3. Such other and further relief or to this court may seem just and proper.

Dated: New York, New York
January 2, 2008

Respectfully submitted,

Richard Jasper
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